

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE	*	
	*	CASE NO. 14-00792 BKT
MARIA IVETTE ORTIZ RIVERA	*	
	*	CHAPTER 13
<u>DEBTOR</u>	*	

DEBTOR'S MOTION REQUESTING ORDER
RE: AUTHORIZATION TO USE FUNDS FROM LIQUIDATION OF SICK LEAVE 2013

TO THE HONORABLE COURT:

NOW COMES, **MARIA IVETTE ORTIZ RIVERA**, debtor, through the undersigned attorney, and very respectfully states and prays as follows:

1. Pursuant to Section 1306(a)(1) and (2) of the Bankruptcy Code, 11 U.S.C. Section 1306(a)(1), (2), property of the estate includes "...all property . . . that the debtor acquires after the commencement of the case but before the case is closed . . . " and "earnings from services performed by the debtor after the commencement of the case but before the case is closed . . .". 11 U.S.C. Section 1306(a)(1) and (2).

2. The debtor has received the 2013 employer's liquidation of sick leave for the year 2013, in the sum of \$1,445.11. Attached is copy of the check as received from the debtor's employer, *Corporacion del Fondo del Seguro del Estado*, dated April 4, 2014. Attached is copy of invoice for said purchase.

3. The debtor respectfully submits to the Court that she needs these funds to pay for: purchase of security windows for her residential property, due to security reasons.

4. The debtor is living within a "tight" budget which covers the household monthly expenses and a Plan payment of \$380.00.

5. Based on the abovestated, the debtor respectfully requests this Court to Order the authorization of the use of these funds to allow the debtor to pay for this expense with

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the "2013 sick leave liquidation".

WHEREFORE, debtor, through the undersigned attorney respectfully requests that this Honorable Court grant the foregoing motion and allow the use of the funds from the 2013 "sick leave liquidation" by the debtor to pay for the above stated expense.

NOTICE: Within fourteen (14) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006 (f) if you were served by mail, any party against whom this paper has been served, or any other party to the action that objects to the relief sought herein shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

I CERTIFY that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF system which will send notice of same to the Chapter 13 Trustee, Jose Ramon Carrion Morales, Esq.; I also certify that a copy of this motion was sent via US Mail to Maria Ivette Ortiz Rivera, PO Box 1206 Yabucoa PR 00767; and to all creditors and parties in interest as per the attached master address list.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 7th day of April, 2014.

/s/ Roberto Figueroa Carrasquillo
RFIGUEROA CARRASQUILLO LAW OFFICE PSC
USDC #203614
ATTORNEY FOR PETITIONER
PO BOX 186 CAGUAS PR 00726
TEL NO 787-744-7699 FAX 787-746-5294
Email: rfigueroa@rfclawpr.com

**WE ARE NOT RESPONSIBLE FOR VARIATIONS IN TILE SHADES
NO SOMOS RESPONSABLES POR LAS TONALIDADES EN LAS LOZAS**



ESTADO LIBRE ASOCIADO DE PUERTO RICO
CORPORACION DEL FONDO DEL SEGURO DE LA VEJEZ
DD271089

Nombre / Dirección	Deposito #	Cantidad	Fecha Efectividad
MARIA I. ORTIZ RIVERA (REGION HUMACAO)	20386191	***1,445.11	4/04/14
	Empleado #	Seguro Social	Div / Dept
	XXXXX1864	XXX-XX-1864	2401/ 822
P.O. BOX 1206 YABUCOA PR 767-1206	Periodo Terminado		
	2014-04-15		

Tipos de Ingresos	Quincena	Horas	Tipos de Ingresos	Quincena	Horas
34 E NO UTILIZADA	1,713.23	60.00			
TOTAL DE PAGO BRUTO ---> 1,713.23			TOTAL DE HORAS -----> 60.00		

Acumulación Ingresos	Acum. Anual	Acumulación Ingresos	Acum. Anual
Total Tributable Seg. Soc.	15,798.22	Total Accum. Anual.	15,798.23

Deducciones	Quincena	Acum. Anual	Deducciones	Quincena	Acum. Anual
Contribucion Sobre Ingreso	137.08	1,124.68	Medicare	24.84	229.07
Seguro Social	106.22	979.49	Retiro		1,382.00

Otras Deducciones	Quincena	Otras Deducciones	Quincena	Otras Deducciones	Quincena
500 DEPOSITO DIRECT	1,445.11				
TOTAL DEDUCCIONES -----> 1,713.23			PAGO NETO -----> 1,445.11		

Comentarios

Label Matrix for local noticing
0104-3
Case 14-00792-BKT13
District of Puerto Rico
Old San Juan
Sun Apr 6 07:50:33 AST 2014

RELIABLE FINANCIAL SERVICES
PO BOX 21382
SAN JUAN, PR 00928-1382

US Bankruptcy Court District of P.R.
Jose V Toledo Fed Bldg & US Courthouse
300 Recinto Sur Street, Room 109
San Juan, PR 00901-1964

Asociacion De Empleados De Gobierno
PO Box 70199
San Juan, PR 00936-8199

Asociacion de Empleados de Ela
PO Box 70290
San Juan, PR 00936-8290

BANCO POPULAR DE PR
Prestamo Hipotecario
PO Box 362708
San Juan, PR 00936-2708

Chld/cbna
PO Box 6497
Sioux Falls, SD 57117-6497

Coop A/C Yabucoena y/o Yabucoop
Sistema De Retiro
PO Box 1
Yabucca, PR 00767-0001

DTOP
PO Box 41269 MINILLAS STATION
SAN JUAN, PR 00940-1269

Fondo Coop
Minillas Sta PO BOX 42006
San Juan, PR 00940-2006

Gecrb/JC Penney PR
PO Box 965007
Orlando, FL 32896-5007

Gladymir Lopez Rodriguez
HC 04 Box 4088
Humacao, PR 00791-8907

(p)CITIBANK
PO BOX 790034
ST LOUIS MO 63179-0034

Radio/cbna
PO Box 6497
Sioux Falls, SD 57117-6497

Sears Credit Cards
PO Box 183081
Columbus, OH 43218-3081

Sears/Cbna
PO Box 6283
Sioux Falls, SD 57117-6283

Sistema De Retiro
PO Box 42003
San Juan, PR 00940-2203

JOSE RAMON CARRION MORALES
PO BOX 9023884
SAN JUAN, PR 00902-3884

MARIA IVETTE ORTIZ RIVERA
PO BOX 1206
YABUCOA, PR 00767-1206

MONSITA LECAROS ARRIBAS
OFFICE OF THE US TRUSTEE (UST)
OCHOA BUILDING
500 TANCA STREET SUITE 301
SAN JUAN, PR 00901

ROBERTO FIGUEROA CARRASQUILLO
PO BOX 186
CAGUAS, PR 00726-0186

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Radio Shack
PO Box 183015
Columbus, OH 43218-3015

(d)The Children's Place Plan
PO Box 183015
Columbus, OH 43218-3015

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

)RELIABLE FINANCIAL SERVICES, INC.

O. BOX 21382

N JUAN, PR 00928-1382

End of Label Matrix

Mailable recipients 20

Bypassed recipients 1

Total 21